

REMARKS

Claim Rejections

Claims 1, 3-11 and 13-18 are rejected under 35 U.S.C. § 102(b) as being anticipated by Kirkman (U.S. 6,064,113). Claims 2 and 12 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Kirkman.

Drawings

It is noted that the Examiner has accepted the drawings as originally filed with this application.

Amendments to Specification

Applicant has amended the specification as noted above to cure obvious grammatical and idiomatic inaccuracies. It is believed that the foregoing amendments to the specification overcome the outstanding objections thereto. No "new matter" has been added to the original disclosure by the foregoing amendments to the specification.

New Claims

By this Amendment, Applicant has canceled claims 10-18 and has amended claims 1-4, 6 and 8-9 of this application. It is believed that the amended claims specifically set forth each element of Applicant's invention in full compliance with 35 U.S.C. § 112, and define subject matter that is patentably distinguishable over the cited prior art.

The cited reference to Kirkman teaches a semiconductor device wherein each opening allows only a single via to pass there through, which is unlike the present invention that has at least two inner through hole located in each of the plurality of opening.

Kirkman does not teach a group of inner through holes including at least two of the plurality of inner through holes passing through each of the plurality of openings and electrically isolated from the ground/power layer.

It is axiomatic in U.S. patent law that, in order for a reference to anticipate a claimed structure, it must clearly disclose each and every feature of the claimed structure. Applicant submits that it is abundantly clear, as discussed above, that Kirkman does not disclose each and every feature of Applicant's amended claims and, therefore, could not possibly anticipate these claims under 35 U.S.C. § 102. Absent a specific showing of these features, Kirkman cannot be said to anticipate any of Applicant's amended claims under 35 U.S.C. § 102.

It is further submitted that Kirkman does not disclose, or suggest any modification of the specifically disclosed structures that would lead one having ordinary skill in the art to arrive at Applicant's claimed structure. Thus, it is not believed that Kirkman renders obvious any of Applicant's amended claims under 35 U.S.C. § 103.


Summary

In view of the foregoing amendments and remarks, Applicant submits that this application is now in condition for allowance and such action is respectfully requested. Should any points remain in issue, which the Examiner feels could best be resolved by either a personal or a telephone interview, it is urged that Applicant's local attorney be contacted at the exchange listed below.

Respectfully submitted,

Date: May 6, 2005

By: _____


Bruce H. Troxell
Reg. No. 26,592

TROXELL LAW OFFICE PLLC
5205 Leesburg Pike, Suite 1404
Falls Church, Virginia 22041
Telephone: 703 575-2711
Telefax: 703 575-2707